

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America  
v.  
Ricardo Noe Hinojosa (1981/US)

Case No. M-19-1846-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 5, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 USC § 841	Possession of a Controlled Substance with Intent to Distribute / Approximately 14 Kilograms of Cocaine, a Schedule II Controlled Substance.
21 USC § 846	Conspiracy to Possess with Intent to Distribute a Controlled Substance / Approximately 14 Kilograms of Cocaine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Approved by AUSA J. DIPIAZZA 8/6/19 @ 8:16am

J. DiPiazza



Complainant's signature

Nicholas C. Stott, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/06/2019 - 8:28 a.m.City and state: McAllen, Texas


Judge's signature

U.S. Magistrate Judge Juan Alanis

Printed name and title

**Attachment "A"**

I, Nicholas C. Stott, am a Special Agent of the United States Homeland Security Investigations (HSI) and have knowledge of the following facts. The facts related in this attachment do not reflect the totality of information known to me or other agents/officers, merely the amount needed to establish probable cause. I do not rely upon facts not set forth herein in reaching my conclusion that a complaint should be issued, nor do I request that this Court rely upon any facts not set forth herein in reviewing this attachment in support of the complaint.

1. On August 5, 2019, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the Hidalgo County Sheriff's Office in Edinburg, Texas. Deputies with the Hidalgo County Sheriff's Office arrested Ricardo Noe Hinojosa (hereinafter HINOJOSA), a citizen of the United States, after being found in possession of approximately 14 kilograms (kg) of cocaine concealed within a box on the rear seat of the Toyota pick-up truck he was driving.
2. Hidalgo County Sheriff's Office deputies stopped HINOJOSA for committing a traffic violation on US Highway 281 in Edinburg, Texas. HINOJOSA was determined to have an outstanding warrant from Starr County, Texas for "Deadly Conduct."
3. During the course of the traffic stop, Hidalgo County Sheriff's Office deputies became suspicious that HINOJOSA was involved in criminal activity and requested and were given consent to search the vehicle. A Hidalgo County Sheriff's Office deputy utilized his drug detection canine on the vehicle HINOJOSA was driving, receiving a positive alert for the presence of controlled substance(s) emitting from the vehicle.
4. A physical search of the vehicle was conducted, and 13 tape wrapped packages, weighing approximately 14 kilograms, were discovered concealed within a box on the rear seat of the vehicle.
5. HINOJOSA was transported to the Homeland Security Investigations (HSI) office where Special Agents interviewed him. HINOJOSA stated he was to be paid \$500 by unknown persons to pick up and deliver what he suspected to be drugs.
6. HSI SAs field tested the substance inside the packages which were presumptive positive for the properties and characteristics of cocaine. The weight of the 13 tape wrapped packages was approximately 14 kilograms.